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Attorneys for Defendant
CAPEL, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

LUANNE S. JORDAN,

Plaintiff,

v.

CAPEL, INCORPORATED, and Does 1
through 60, inclusive,

Defendants.

CASE NO. C054939 SI

**STIPULATION AND [PROPOSED]
ORDER TO DELAY COMPLETION
OF MEDIATION**

COMPLAINT FILED:
October 31, 2005

The parties, through their respective counsel, seek to amend certain Court ordered dates and schedules for this case.

1. October 31, 2005, plaintiff Luanne S. Jordan (“Jordan” or “plaintiff”) filed a civil action in the Superior Court, City and County of San Francisco, against defendant Capel, Inc.

1 (“Capel” or “defendant”). Defendant removed the action to this Court pursuant to 28 U.S.C. §
2 1441(b).

3 2. Plaintiff alleges, inter alia, breach of contract, fraud, unfair business practices,
4 violations of the California Labor Code, and bad faith. Defendant denies all such allegations.

5 3. The Court ordered, in consultation with the parties, at the conclusion of a Case
6 Management Conference on March 30, 2006 a schedule and certain dates for the parties to accomplish
7 specified events.

8 4. The parties agree that the discovery process is taking longer than originally
9 anticipated and hereby stipulate to REQUEST that completion of mediation be delayed to July 30,
10 2006 on the Court ordered schedule and hereby REQUEST that the Court shall so order.

11 5. The other Court ordered dates shall remain as previously ordered.
12

13 DATED: JUNE 7, 2006

KAUFF MCLAIN & MCGUIRE LLP

14 /S/ Matthew P. Vandall
15 JEFFREY C. POLSKY
16 MATTHEW P. VANDALL
17 ATTORNEYS FOR DEFENDANT CAPEL,
INC.

18 **I HEREBY ATTEST THAT I HAVE ON FILE ALL HOLOGRAPH SIGNATURES FOR**
19 **ANY SIGNATURES INDICATED BY A “CONFORMED” SIGNATURE (/S/) WITHIN THIS**
20 **FILED DOCUMENT.**

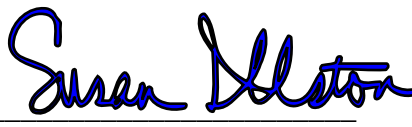
21
22 DATED: JUNE 8, 2006

LAW OFFICES OF WILLIAM H. PAYNTER

23 /S/
24 WILLIAM H. PAYNTER
25 ATTORNEY FOR PLAINTIFF
LUANNE S. JORDAN

26
27 IT IS SO ORDERED:

28 DATE : JUNE _____, 2006


SUSAN ILLSTON
JUDGE, U.S. DISTRICT COURT